

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Mobile Equity Corp.,

Plaintiff,

v.

Walmart Inc.,

Defendant.

Civil Action No.: 2:21-CV-00126-JRG-RSP

JURY TRIAL DEMANDED

EXPERT REPORT OF MARKUS JAKOBSSON, Ph.D.

computer science, computer engineering, or equivalent degree with two years of experience or a master's degree in computer science, computer engineering, or equivalent degree.

38. I am familiar with the knowledge such a person of ordinary skill would have possessed.

II. Summary of Opinions

39. It is my opinion that Walmart infringes claims the following claims of the '236 and '058 Patents, as detailed below.

Patent	Asserted Claims
'236 Patent	1, 2, 3, 4, 5, 10, 11, 12, 14
'058 Patent	1, 3, 6, 8, 13, 14

40. It is my opinion that Walmart would not have had any noninfringing alternatives that were technically feasible, at the time infringement began through present.¹⁵

III. Understanding of Legal Principles

A. Infringement

41. I understand that a determination of infringement is a two-step process. First, the claims are construed. Second, the construed claims are compared to the accused instrumentalities to determine whether the accused instrumentalities contain each and every element required by at least one claim of a given asserted patent.

42. I have reviewed the Court's Claim Construction Opinion and Order in this case, and I have applied the constructions set forth therein in forming my opinions expressed in this

¹⁵ It is my understanding that Walmart's alleged infringement began by December 10, 2015 when Walmart publicly released Walmart Pay and used it for transactions. *See, e.g.*, WMT-MEC00126_0001430 (December 11, 2015 Walmart Press Release stating that "Walmart Introduces Walmart Pay").